

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No. 23-cv-12579

Honorable:

vs.

Mag. Judge:

Real property located at
3350 Howell Street, Duluth, GA 30096,

Defendant *in rem*.

Complaint for Forfeiture

Plaintiff, the United States of America, by and through Assistant United States Attorney Adriana Dydell, states the following in support of this Complaint for Forfeiture:

Jurisdiction and Venue

1. This is an *in rem* civil forfeiture action under 18 U.S.C. § 981(a)(1)(C) related to a violation or violations of 18 U.S.C. § 1957.
2. This Court has original jurisdiction over this forfeiture action under 28 U.S.C. § 1345 because this action is being commenced by the United States of America as Plaintiff.

3. This Court has jurisdiction over this forfeiture action under 28 U.S.C. § 1355(b)(1)(A) because an act giving rise to the forfeiture occurred in the Eastern District of Michigan.

4. Venue is proper before this Court under 28 U.S.C. § 1391(b)(2) and (3) because a substantial part of the events or omissions giving rise to this action occurred in the Eastern District of Michigan.

Defendant *in rem*

5. The Defendant *in rem* consists of real property located at 3350 Howell Street, Duluth, GA 30096, and is more fully described as:

All that tract or parcel of land lying and being in Land Lot 293 of the 6th District, Gwinnett County, Georgia, being Lot 9, Gardendale, as per plat recorded in Plat Book 152, pages 195-198, Gwinnett County, Georgia records, which recorded plat is incorporated herein by reference and made a part of this description.

Parcel ID: R 6293 073

The Defendant *in rem* is subject to forfeiture to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) as property involved in money laundering transactions in violation of 18 U.S.C. § 1957.

6. On or about July 8, 2022, the United States recorded a *lis pendens* against the Defendant *in rem* in Gwinnett County, GA in connection with criminal case 2:22-cr-20323, also pending in the Eastern District of Michigan.

Underlying Criminal Statute

7. 18 U.S.C. § 1957 prohibits knowingly engaging, or attempting to engage, in a monetary transaction with criminally derived property in an amount greater than \$10,000 where such property is derived from specified unlawful activity.

Statutory Basis for Civil Forfeiture

8. 18 U.S.C. § 981(a)(1)(C) provides for civil forfeiture of any property, real or personal, which constitutes or is derived from proceeds traceable to any offense constituting “specified unlawful activity.”

Factual Basis in Support of Forfeiture

9. The Defendant *in rem* was involved in a knowing violation or violations of 18 U.S.C. § 1957 and is therefore subject to forfeiture under 18 U.S.C. § 981(a)(1)(C). Evidence supporting forfeiture includes, but is not limited to, the following:

a. CEO Enterprises LLC was formed on July 29, 2016 in the state of Georgia.

b. On April 18, 2017, Ogunghide and his wife, Mona Lee, opened a JPMorgan Chase bank account (the “Chase account”) in the name of CEO Enterprises LLC. The investigation has revealed that Ogunghide controlled this account.

c. The Chase account was initially funded with \$142,364 from a Bank of America (BOA) account, also in the name of CEO Enterprises LLC, with Christian Ogunghide as the sole signatory. The BOA account was open from August 29, 2016 until February 2, 2017.

d. In the short time it was open, the BOA account received money from several sources, including a company in Illinois that was the victim of a Business Email Compromise (BEC) fraud scheme. The Illinois victim wired \$148,000 to the BOA account in response to a fraudulent email.

e. Similarly, in the short time the Chase account was open (April 18, 2017, to July 13, 2017), it received over a million dollars in funds, including \$195,000.00 from two victims of romance scams and \$867,155.66 from a company in Oakland County, Michigan that was also the victim of a BEC.

f. Chase bank records for the CEO Enterprises’ account show that, among other transactions, \$285,000 from this account was used to

purchase real property in Mableton, Georgia. On July 7, 2017, \$285,000 was wired to a Central Bank of the Ozarks account titled to Flawless by Abby LLC for purchase of the Mableton real property.

g. The Chase bank account was closed on July 13, 2017.

h. In or about September 2021, the Mableton property was sold for \$480,000 and the proceeds of the sale were used to purchase the Defendant *in rem* on October 12, 2021.

i. The seller of the Defendant *in rem* identified Christian Ogunghide as the actual purchaser and resident of the property.

j. Based on the foregoing, the funds used to purchase the Defendant *in rem* can be traced to funds received in connection with at least two romance scams and a BEC fraud.

k. On June 24, 2022, Christian Ogunghide was indicted in the Eastern District of Michigan on six counts of conducting monetary transactions in property derived from wire fraud under 18 U.S.C. § 1957 (Case No. 2:22-cr-20323).

Claim for Relief

10. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 9, including all subparts.

11. The Defendant *in rem* is forfeitable to the United States of America under 18 U.S.C. § 981(a)(1)(C) because it was involved in a knowing violation or violations of 18 U.S.C. § 1957.

Conclusion and Relief

Plaintiff respectfully requests that this Court issue a warrant for arrest of the Defendant *in rem*; that due notice be given to all interested parties to appear and show cause why forfeiture should not be decreed; that judgment be entered declaring the Defendant *in rem* condemned and forfeited to the United States for disposition according to law; and, that the United States be granted such further relief as this Court may deem just and proper, together with costs and disbursements of this action.

Respectfully submitted,

Dawn N. Ison
United States Attorney

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Dated: October 12, 2023

VERIFICATION

I, Sean Callaghan, am a Special Agent with the Federal Bureau of Investigation. I have read the foregoing Complaint for Forfeiture and declare under penalty of perjury that the facts contained therein are true to the best of my knowledge and belief, based upon knowledge possessed by me and/or on information received from other law enforcement agents.



Sean Callaghan
Special Agent
Federal Bureau of Investigation

Dated: October 11, 2023